

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

DONATO APONTE NAVEDO, BELKIS
ISABEL SANTIAGO MARTÍNEZ, AND
THEIR COMMUNITY OF ACQUETS AND
GAINS,

CIVIL NO. 09-01232 (GAG)

Plaintiffs,

v.

NALCO CHEMICAL COMPANY, JOSÉ
SERRANO AND HIS WIFE JANE DOE
(1), AND THEIR COMMUNITY OF
ACQUETS, AND GAINS, JORGE
CASTILLO AND HIS WIFE JANE DOE
(2), AND THEIR COMMUNITY OF
ACQUETS AND GAINS, ASHOK PAUL
DUGGAL AND HIS WIFE JANE DOE
(3), AND THEIR COMMUNITY OF
ACQUETS AND GAINS AND ABC
INSURANCE,

TITLE VII VIOLATIONS, AGE,
GENDER AND NATIONAL ORIGIN
DISCRIMINATION, AMERICANS WITH
DISABILITIES ACT AND TORTS

PLAINTIFFS DEMAND TRIAL BY JURY

Defendants.

MOTION REQUESTING BRIEF EXTENSION OF TIME TO ANSWER
COMPLAINT OR OTHERWISE PLEAD

TO THE HONORABLE COURT:

COMES NOW codefendant Nalco Company f/k/a Nalco Chemical Company ("NALCO" or the "appearing defendant"), through the undersigned attorneys, and without submitting itself to the jurisdiction of this Honorable Court, respectfully states, alleges and prays as follows:

The appearing codefendant had requested an extension of time, which ends today, in order to answer the Complaint or otherwise plead, which extension was granted by this Honorable Court.

Notwithstanding, the appearing codefendant is in need of an additional brief extension of time of fifteen (15) days, to end on Tuesday, July 7, 2009, in order to provide its answer to the Complaint.

The reason for the requested extension is that the undersigned attorneys are waiting to receive some crucial information/documentation from their clients in Illinois to be able to responsibly submit the answers to plaintiffs' numerous and detailed allegations, as well as the fact that the company's main contact for the undersigned here in Puerto Rico has been and will be out of Puerto Rico due to his mother's recent passing and previously scheduled professional commitments.

WHEREFORE, the appearing codefendant respectfully requests from this Honorable Court a brief extension of time of fifteen (15) days, to end on Tuesday, July 7, 2009, in order to responsibly submit its answer to plaintiffs' numerous and detailed allegations as contained in the Complaint.

RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY: That on this same date we electronically filed the present motion with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the

following: *Miguel A. Cuadros Pesquera, Esq.*, Law Offices of Cuadros & Cuadros, Centro de Seguros Bldg., Suite 215, 701 Ponce de León Avenue (Miramar), San Juan, Puerto Rico 00907; and all other attorneys of record, if any.

In San Juan, Puerto Rico, this 22nd day of June, 2009.

s/ Arturo Díaz-Angueira, 117907
s/ Roberto Feliberti, 208002
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